

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR

May 7, 2004



EPA Docket Center
Environmental Protection Agency
Mailcode: 2822T
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: Docket No. ORD-2003-0016

Dear Madam or Sir:

The American Chemistry Council's Oxo Process Panel (Panel) is pleased to provide scientific information on propionaldehyde in response to EPA's Integrated Risk Information System (IRIS) Request for Information (69 Fed. Reg. 5971) (February 9, 2004). The Panel includes the major U.S. producers and processors of oxo process chemicals.¹

In 2001, the American Industrial Hygiene Association's Workplace Environmental Exposure Levels Committee approved a workplace environmental exposure level (WEEL) document for propionaldehyde. The document includes information on physical and chemical properties as well as an extensive discussion of relevant health effects information. The final document is enclosed.

In 1994, the Organization for Economic Cooperation and Development (OECD) considered propionaldehyde under its Screening Information Data Set (SIDS) program. The OECD program, a voluntary cooperative international testing program that began in 1989, focuses on developing base level testing information on high production volume chemicals. The Oxo Process Panel volunteered propionaldehyde in the OECD program and EPA, the country sponsor, presented it to the international community in 1994 where its conclusion, "low priority for further work" was accepted. The final documents include a SIDS dossier and a SIDS Initial Assessment Report (SIAR). Copies of these two documents are enclosed.

The Panel understands that EPA's interest in propionaldehyde stems primarily from its presence in emissions from mobile sources. The Panel also is aware that EPA has undertaken efforts recently to improve the process by which it determines relative priorities for updates to IRIS database entries. Toward that end, we note that EPA has estimated that propionaldehyde represents less than 1.0% of HAP emissions from mobile

¹ Members of the Oxo Process Panel include: BASF Corporation, BP Chemicals, Celanese Limited, Dow Chemical Company, and Eastman Chemical Company.

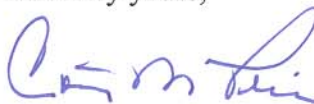


Responsible Care®

sources. (See <http://www.epa.gov/otag/regs/toxics/r01038.pdf>) Further, propionaldehyde emissions from mobile sources are predicted to decline by 38% by 2007. The Agency may want to take this information into consideration when determining the relative priority of propionaldehyde versus other compounds for an IRIS assessment.

The Oxo Process Panel appreciates the opportunity to provide information on propionaldehyde. If you have questions or comments, please contact Barbara Francis, manager of the Oxo Process Panel at 703-741-5609 or by e-mail at: Barbara_Francis@americanchemistry.com.

Sincerely yours,



Courtney M. Price
Vice President, CHEMSTAR

Attachments